IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO ex	rel.)	
State Engineer,)	
Plaintiff,)	
v.)	Case No.: 69cv07941 MV-LFG
ROMAN ARAGON, et al.,)	RIO CHAMA STREAM SYSTEM
Defendants.)	Rio Brazos, Section 7 Subfile No.: CHRB-001-0002
	<u>)</u>	

MOTION TO WITHDRAW REPRESENTATION FOR BRAZOS MUTUAL DOMESTIC WATER CONSUMERS ASSOCIATION PURSUANT TO COURTS ORDER TO SHOW CAUSE

COMES NOW, JAlbright Law, LLC (Jeffrey H. Albright) files this Motion to Withdraw Representation of Defendant BRAZOS MUTUAL DOMESTIC WATER CONSUMERS ASSOCIATION ("BMDWCA"), pursuant to the Courts Order to Show Cause on the Notice of Withdrawal for Defendant. Withdrawal as counsel for BMDWCA was discussed with and accepted by the Acting President and other BMDWCA Board members in March and April 2022. It was confirmed and formalized in a letter to BMDWCA dated April 11, 2022. JAlbright Law, LLC has not had any further discussions with BMDWCA since then.

Pursuant to D.N.M.LR-Civ. 83.8 (b) this Motion will be served on the following based on the latest information publicly available to JAlbright Law, LLC:

Brazos Mutual Domestic Water Consumers Association HC 75 Box 105 Chama, NM 87520

(505) 756-8264 (Bob Cooke, President) (520) 850-3396 (Irvin Lindemuth, Vice President) This Motion will also be sent via e-mail to the President, and Vice President listed on the Brazos website https://upperbrazoswater.org/

President—Bob Cooke <u>bob.cooke@upperbrazoswater.org</u>

Vice President—Irvin Lindemuth irvin.lindemuth@upperbrazoswater.org

BMDWCA has 14 days to respond to this Motion from date of service if there are any objections to this Motion to Withdraw. Failure to object within this time constitutes consent to grant the Motion.

Respectfully submitted,

By: /s/ Jeffrey H. Albright

Jeffrey H. Albright, Attorney

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 28, 2022, I filed the foregoing *Motion to Withdraw Representation for Brazos Mutual Domestic_Water Consumers Association Pursuant to Courts Order to Show Cause* electronically through CM/ECF System, which caused the parties to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/Jeffrey H. Albright